

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**NOTICE OF THE UNITED STATES POSTAL SERVICE  
OF FILING OF RESPONSE OF WITNESS EMILY ROSENBERG  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
(APWU/USPS-T3-22)**

The United States Postal Service hereby files the response of witness Emily Rosenberg to the above-identified interrogatory of the American Postal Workers Union, which was filed under seal on February 14, 2012. The interrogatory contains facility-specific volume data that were filed non-publicly by the Postal Service as part of USPS Library Reference N2012-1/NP2. To facilitate the filing of a public response to the interrogatory filed under seal, those non-public data are redacted from the interrogatory here, which is otherwise stated verbatim and is followed by the response, which contains no non-public data.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE  
WITNESS ROSENBERG TO APWU INTERROGATORY**

**APWU/USPS-T3-22** Please refer to the NP2 workbook "NP2\_FY2010 Workload Volume by Operation Type.xls".

- a) In tab 'P-OGP', rows 32-33, 35-36, and 38 apply the column-H "ZIP3 percentages" of TIMES volume to the column-L **[Volume Figure A]** MODS volume in order to distribute that volume to the 3-digit ZIPs 018-019, 021-022, and 024. Why aren't the column-K "ZIP3 percentages" of ODIS volume applied instead to this **[Volume Figure A]** MODS volume in order to distribute the **[Volume Figure A]** to these 3-digit ZIPs?
- b) Also in tab 'P-OGP', rows 128-131 apply the column-H "ZIP3 percentages" of TIMES volume to the **[Volume Figure B]** (column-J) ODIS volume in order to distribute that volume to the 3-digit ZIPs 124-127. Why aren't the column-K "ZIP3 percentages" of this same **[Volume Figure B]** ODIS volume applied instead in order to allocate that volume to ZIPs 124-127?
- c) In tab 'PRI', the column heading "FYi 0-ODIS INP PRI ADV" is listed for columns F-K. Please define this column heading, and in particular the term "INP PRI". Please include in this definition an explanation of how to interpret "INP PRI" as it applies to the row 14 subheadings "ZIP3-0", "Facility-O", and "ZIP3-0%" in columns F, H, J, respectively.

**RESPONSE**

*[Volume Figures A and B are contained in the interrogatory as filed under seal on February 14, 2012, but are redacted above to facilitate the filing of a public response to the interrogatory]*

- a) TIMES distribution, described in USPS-T-3 footnote 20, was used for origin volume distribution because it a reliable representation of origin distribution.
- b) See the response to part a.
- c) The term INP (Incoming Primary) is not representative of all the subheadings. The subheadings include both outgoing and incoming categories.